



Fifth Program Year Action Plan

GENERAL

Executive Summary

Program Year 5 Action Plan Executive Summary:

The Consolidated Plan is a consolidation of various programs of the Department of Housing and Urban Development (HUD), including the Community Development Block Grant (CDBG), Emergency Shelter Grant (ESG) and HOME programs. The City of Canton (City) is an “impacted city” under the CDBG program and a “participating jurisdiction” (PJ) under the HOME program. The city receives direct allocations of funding for CDBG, ESG, and HOME.

In accordance with HUD regulations, the city’s Consolidated Plan for FY 2009 – 2013 provides an area-wide assessment of housing and homeless needs, housing market analysis, and a strategic plan for the allocation of housing resources within the City. In addition, the Consolidated Plan describes the priority community development needs eligible for assistance under the CDBG program. This includes an assessment of the needs for public facilities, infrastructure improvements, public services, accessibility, historic preservation, economic development, fair housing and planning needs. The Plan provides the City’s long-term and short-term community development goals and objectives that have been developed to address the national goals of the CDBG program, which include:

- The provision of decent housing that is affordable to low- and very low-income households.
- The provision of suitable living environment, improving the safety and livability of neighborhoods, increasing access to quality facilities and services, improving housing opportunities, and revitalizing deteriorated neighborhoods.
- The expansion of economic opportunities, creating jobs that promote long term economic and social viability and that are accessible to low- and very low-income persons.

In preparing the current One Year Action Plan, the City had to address those needs which met one of the three statutory objectives of the CDBG program: benefit to low and moderate-income persons, elimination of slum and blighting conditions, or an urgent community development need.

This is the Fifth year of the 2009-2013 Consolidated Plan. This Action Plan presents a one year action plan for the allocation of \$4,246,534 in CDBG funds, \$250,000 in CDBG anticipated program income, \$531,422 in HOME funds, \$833,578 in HOME funds remaining from previous years, and \$220,000 in Emergency Shelter Grant funds.

The City has determined to undertake the following activities with FY 2013 CDBG funds:

Activity	FY 2013 Funding
Administration	\$523,836
Youth Development	\$246,260
Fair Housing	\$10,000
Neighborhood Grants	\$50,000
Summer Jobs	\$50,000
Public Service Grants	\$10,000
Food Vouchers	\$25,000
Demolition and Board ups	\$330,000
Public Facility improvements	\$85,000
Land	\$80,000
In-house Rehab programs	\$853,500
ADA Curb replacement	\$120,000
Economic Development	\$330,000
Central Neighborhood projects	\$700,000
Northeast Neighborhood projects	\$700,000
Program Delivery Costs	\$382,938
TOTAL	\$4,496,534

The City has determined to undertake the following activities with FY 2013 HOME funds:

Activity	FY 2013 Funds
HOME Administration	\$65,000
CHDO Operating Expense	\$22,000
Tenant Based Rental Assistance	\$100,000
Veteran's Home Ownership – Phase II	\$204,000
Homeowner Rehab Projects	\$474,000
Developer Projects (RFP)	\$500,000
TOTAL	\$1,365,000

The City has determined to undertake the following activities for FY2013 ESG Funds:

Activity	
Administration	\$22,000
Projects (RFP)	\$198,000
TOTAL	\$220,000

General Questions

1. *Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.*

Because the City of Canton is predominately low-mod income, the geographic area includes the entire city. The southern two-thirds of the city consists of census tracts that all have a majority of low-mod income residents, as well as a minority population concentration. The 20 targeted census tracts and block groups all exceed the 50% level for low-mod income with figures ranging from 52.5% to 87% of the population being low-mod.

In addition, the City of Canton is proposing to establish two Neighborhood Revitalization Strategy Areas, the Eastside Area and the Central Area. The Eastside strategy area covers much of the northeast and southeast sections of the city. The Central strategy area covers the downtown and nearby surrounding neighborhoods to the west. HUD encourages the establishment of a Neighborhood Revitalization Strategy Area (NRSA) as a means to create communities of opportunity in distressed neighborhoods. The goal of this program is to reinvest in human and economic capital, and economically empower low-income residents as part of an overall community revitalization strategy. The City of Canton's proposed NRSA's encompass two of the city's most distressed areas. Under the FY 2013 Action Plan, the City is proposing to allocate \$700,000 for activities within each NRSA.

Programs that are income qualified will be open to all areas of the City, programs that are area qualified will be directed to only those projects that take place in the low-mod areas of the City. The City estimates that 75% of its Consolidated Funds will be expended within the target areas.

2. *Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.*

HOME and ESG funds are allocated primarily on a competitive basis through Request for Proposals (RFP) process. Limited direct allocations are also made with these funds. CDBG funds will be distributed through a combination of RFPs and direct allocations.

RFP's are mailed to all developers, subrecipients, and CHDOs for HOME and ESG. They are also made available on the City website. Returned applications are submitted to the Department of Development Scoring Committee and recommendations are submitted to Canton City Council for review, comment and approval.

3. *Describe actions that will take place during the next year to address obstacles to meeting underserved needs.*

The City will continue to work with the community to plan for future funding applications. When additional funding becomes available, activities that address underserved needs will be examined and reviewed for possible funding.

4. *Identify the federal, state, and local resources expected to be available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.*

The City will continue to explore additional funding opportunities through federal, state and local agencies.

Managing the Process

1. *Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.*

The City is the lead agency for the CDBG, ESG, and HOME programs, and employs the Department of Development to carry out the programs. As mentioned the City uses developers, subrecipients, and CHDOs chosen through an RFP process and direct allocation to administer various programs on its behalf.

The DOD will utilize the assistance of the Building and Code Department to administer a Demolition and Board up Program.

2. *Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.*

The City undertakes a planning process that calls for citizen participation to be obtained through public meetings and input to be solicited from relevant County and City agencies and other organizations providing housing, economic development and community development services and/or advocacy for persons of low and moderate incomes. Canton has developed a Citizen Participation Plan setting forth policies and procedures for citizen participation. The Consolidated Plan is also available on the City's website for review and comment.

3. *Describe actions that will take place during the next year to enhance coordination between public and private housing, health and social service agencies.*

The City is an active member of the Stark County Housing Task Force, Stark County Interagency Council on Homelessness, and the Community Building Partnership (local intermediary) and the Stark County Housing Trust Fund. Each of these groups is comprised of various business, local governments, foundations, private non-profit agencies and social service agencies. While each targets a specific segment of the local population, coordination between the groups is vital for providing a wide range of housing and community development opportunities and services to the low- and moderate-income populations of the City of Canton and the surrounding area.

Citizen Participation

1. *Provide a summary of the citizen participation process.*

The City undertakes a planning process that calls for citizen participation to be obtained through public hearings, the City website and local community organizations.

At the beginning of the planning process, a public notice is issued stating the amount of funds and types of activities being proposed, plans for minimizing displacement of persons, and giving a review of prior program performance. Citizens are encouraged to attend hearings on the Plan and submit comments. The notice will be published in The Repository, on the City website and distributed through local community organizations.

Prior to submission a second notice will be issued through the same sources, stating the submission date, proposed activities and objectives, location of activities, amount of funds and location where the application can be reviewed.

In addition, The City will provide a performance survey on the City website to solicit public opinion on the effectiveness of the programs prior to the submission of the CAPER.

The Plan also includes provisions to provide technical assistance to persons developing proposals and to provide timely access to records, and establishes a complaint procedure.

2. *Provide a summary of citizen comments or views on the plan.*

Not available at this time.

3. *Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.*

Notices of all public meetings with regard to CDBG, HOME and ESG programs are published in The Repository. In addition, notices are published on the City's website and through local public agencies.

4. *Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.*

Not available at this time.

Institutional Structure

1. *Describe actions that will take place during the next year to develop institutional structure.*

The City is continuing the process of restructuring the Department of Development based on retirements and other staff changes. In 2013, the City will continue working with technical assistance advisors provided by HUD to improve the department's structure, policies, and programs. The City will also continue an increased focus on staff training and education.

The City continues to be involved in Stark County Housing Task Force, Stark County Interagency Council on Homelessness and Community Building Partnerships. By actively participating in these groups, better coordination and understanding of community development and housing programs can be realized.

Monitoring

1. *Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.*

The City follows the federal guidelines for monitoring activities funded with federal block grant funds.

The formal monitoring process utilizes a comprehensive monitoring approach that begins after an award has been granted which includes a review of agency policies, procedures, financial records, and project documentation.

Every contract that utilizes federal funds contains federal requirements applicable to a program or project. All agencies receiving funding are monitored through monthly desk audits, reviews of pay requests and on-site visits as necessary to ensure compliance with all regulations.

The City will review activities on a quarterly basis to ensure that activity goals are being met and will made adjustments as necessary. The quarterly review will include a review of goals and activities as well as expenditure of funds to ensure timeliness requirements are being met.

Housing projects are monitored in accordance with the City's monitoring plan each year to ensure compliance with housing codes. The monitoring includes on-site inspection with the proper notification provided to the managing entity in accordance with federal requirements.

A written report is issued following a formal monitoring session, and any findings or concerns that require action are followed up on by both the subrecipient and City staff.

Lead-based Paint

1. *Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.*

The Canton City Health Department offers testing for lead based paint and lead based paint hazards through its Lead Poisoning Prevention Program to City homeowners. It also educates the public about the hazards of lead based paint, symptoms of lead based paint poisoning, and how to avoid exposure to lead based paint.

The City requires a Lead Risk Assessment for all housing projects except emergency repairs which is provided by the City Health Department, and has established guidelines for dealing with lead hazards in homes it rehabs.

In 2011, Canton City Council approved an ordinance which required all home improvement contractors conducting renovations in pre-1978 housing to be certified with accredited training and to follow work practice requirements of the Lead-Based Paint Poisoning Prevention Regulations (40 CFR 745, Subpart E- Residential Property Renovations). Each contractor performing work on Department of Development projects is screened to ensure compliance.

The DOD facilitated two training seminars to assist contractors to become Lead Safe Renovators. The DOD will only work with contractors who have the State required certification for LSR.

HOUSING

Specific Housing Objectives

1. *Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.*

Potential Objectives (Specific projects to be determined through the RFP process.)

ESG

Priority: Assist homeless persons to obtain appropriate housing

Objective: Provide transitional housing

Priority: Assist homeless persons to obtain appropriate housing

Objective: Provide emergency shelter

Priority: Assist persons at risk of becoming homeless

Objective: Provide financial assistance to households

CDBG

Priority: Retain affordable housing stock

Objective: Provide repairs for homeowners

HOME

Priority: Retain affordable housing stock

Objective: Provide whole house rehab for homeowners

Priority: Increase the availability of affordable housing

Objective: Provide rental assistance to low income persons

Priority: Increase the availability of affordable housing

Objective: Assist in the construction of new housing units

Priority: Increase the availability of affordable housing

Objective: Assist in the rehabilitation of vacant, existing units

2. *Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.*

Several of the projects listed above will utilize state and local resources to bring matching funds to the project. The City also anticipates working with a CHDO to utilize Low-Income Housing Tax Credits.

Needs of Public Housing

1. *Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in*

homeownership.

The City has a strong working relationship with the Stark Metropolitan Housing Authority (SMHA). The City supports the housing authority's Comprehensive Grant Program and partners with the agency on several projects.

2. *If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.*

Not applicable.

Barriers to Affordable Housing

1. *Describe the actions that will take place during the next year to remove barriers to affordable housing.*

The City is an active member of the Stark County Housing Task Force. This task force meets monthly to discuss issues and barriers related to affordable housing. The City will continue to be actively involved in any discussion on removing barriers to affordable housing.

The City Planning Department is responsible for subdivision review and approval as well as zoning recommendations. Consideration of any changes to zoning will bear in mind the consequences it may have on affordable housing.

HOME/ American Dream Down payment Initiative (ADDI)

1. *Describe other forms of investment not described in § 92.205(b).*

The City will not use a form of assistance not described in 92.205(b)

2. *If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.*

All City of Canton housing programs that involve acquisition are modest single- family houses that do not exceed 95% of the area median purchase price. In the case of acquiring and rehabbing, the house has an estimated after rehab value that does not exceed 95% of the area median purchase price. Section 92.203(b) limits are used for homebuyer assistance or rehab of owner occupied single- family housing. All homebuyers are low-income who reside in the home. The City uses the recapture provision as stated in 92.254(a)(5) and uses the affordability standard stated in 92.254(a)(4).

Specifically, as a condition of the provisions of the Deferred Loan, the Buyer agrees to repay the City the outstanding balance of the Loan upon the earliest to occur, within the applicable Recapture Period:

- a) a sale, refinance, conveyance, or other transfer of the Residence for consideration, excluding any sale, conveyance, or transfer (i) to a spouse upon a dissolution of a marriage; (ii) to the surviving spouse upon the death of a joint tenant Homeowner; (iii) by will, by foreclosure, or deed in lieu of foreclosure, or otherwise by operation of law; or (iv) as may be accepted by the City in writing; or
- b) the Residence is no longer the Buyer's principal place of residence or is converted in whole or in part to a rental unit; or
- c) there exists a default by the Buyer, beyond any applicable cure period, under the Promissory Note and Open-End Mortgage by and between the Buyers and the City or any other document evidencing the Loan.

For the purpose of this section, "Recapture Period" shall mean the applicable period based on the affordability standards. In the case of a sale, refinance, conveyance, or other transfer, the amount of repayment shall be initial principal balance of the Loan or net proceeds of sale if full amount of outstanding assistance is not available. If none of these events described in clauses (a), (b), or (c) above occurs prior to the expiration of the "Recapture Period", the Loan shall be forgiven in its entirety at the end of the affordability period.

3. *If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:*

- a. *Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.*
- b. *Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.*
- c. *State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.*
- d. *Specify the required period of affordability, whether it is the minimum 15 years or longer.*
- e. *Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally*

- designated Empowerment Zone or Enterprise Community.*
- f. *State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.*

Not Applicable

4. *If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:*
 - a. *Describe the planned use of the ADDI funds.*
 - b. *Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.*
 - c. *Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.*

The City does not receive American Dream Down payment Initiative funds.

HOMELESS

Specific Homeless Prevention Elements

1. *Sources of Funds - Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.*

The Stark County Regional Planning Commission was the entity responsible for the writing and submission of the McKinney Vento Continuum of Care applications. The City, along with the Stark County Interagency Council on Homelessness strives to ensure all available funding is captured when looking at ways to fund and end homelessness.

2. *Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.*

Canton Alliance, Massillon, Stark County, local agencies, non-profit organizations, businesses, foundations and others have joined together to form the Stark County Interagency Council on Homelessness (SCICH). The mission

of SCICH is to:

- a. Prevent and end chronic homelessness in Stark County.
- b. Insure a coordinated safety net of emergency services for those in a short-term housing crisis.
- c. Coordinate and consolidate local efforts to provide a cost-effective and streamlined system for addressing homelessness.

The SCICH has become the entity responsible for the Continuum of Care homeless assistance grant application process for Stark County.

3. *Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.*

The SCICH has completed a strategic planning process that was updated in 2008 on how to address the issue of ending chronic homelessness by 2012. This is a very time consuming and tedious process. Given the fact that the SCICH is an all-volunteer organization, progress moves at a slow pace. The SCICH is now working on implementing the planning strategy.

4. *Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.*

As mentioned previously, Canton is funding several activities to prevent the reoccurrence of homelessness. Funding is being allocated to the Community Services Family Living Center, The Alliance Emergency Residency, The Alliance for Children and Families, and SMHA for Tenant Based Rental Assistance. In addition, funding has been allocated to the Stark Prescription Assistance Network (PAN) to assist with providing medications to persons in need and also to the Western Stark Medical Clinic for the Health Care-a-van to provide health and dental services to the homeless population in the City of Canton.

5. *Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.*

The Grant Improvement Process Committee of the SCICH has worked diligently over the past years to develop a Discharge Policy. Plans have been developed and implemented by the foster care system, health care system, mental health system and corrections system. These plans/policies are detailed in the Continuum of Care applications.

EMERGENCY SHELTER GRANTS (ESG)

(States only) Describe the process for awarding grants to State recipients, and a

description of how the allocation will be made available to units of local government.

Not Applicable

COMMUNITY DEVELOPMENT

Economic and Community Development

1. *Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.*

The City's priority non-housing community development needs that will be funded through this application are Acquisition, Improvements to Public Facilities, Public Services and Economic Development.

2. *Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.*

**Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.*

Potential Objectives (Specific projects to be determined through the RFP process.)

Acquisition

Objective: Creating suitable living environments for low and moderate homeowners

Need: Restoring vacant land to a usable purpose, paying holding costs of that process

Public Improvements

Objective: Stimulate the economy and create jobs for low and moderate income persons through infrastructure improvements

Need: Job Creation

Objective: Improve facilities providing services for low and moderate persons

Need: Make needed improvements to public facilities

Objective: Improving the safety and livability of neighborhoods
Need: Improve accessibility

Public Services

Objective: Improve services for low and moderate income persons
Need: Youth Services

Objective: Improve services for low and moderate income persons
Need: Neighborhood development and stabilization

Objective: Improve services for low and moderate income persons
Need: Senior Services

Objective: Improve services for low and moderate income persons
Need: Crime awareness, gang violence, and cultural diversity training

Objective: Improve services for low and moderate income persons
Need: Fair Housing services

Economic Development

Priority: Improve economic opportunities for low-income persons
Objective: Create and retain jobs

Antipoverty Strategy

1. *Describe the actions that will take place during the next year to reduce the number of poverty level families.*

Collaborative efforts among agencies in Stark County work to encourage the development of unified service systems, which work with families, and individuals to empower them to meet their physical, emotional, intellectual and social needs.

The programs that currently fall under the jurisdiction of the City of Canton include CDBG and HOME. The HOME program will continue to address activities which will assist persons to remain in their homes, keep their homes decent, safe and sanitary and providing affordable housing opportunities for low- and moderate-income persons.

The same goals will be addressed through some CDBG programs. The City will provide grants housing rehabilitation, allowing low- and moderate-income persons to use their limited resources for other necessary items (i.e. clothing, food, etc.).

The City will continue to endorse SMHA's programs for family self-sufficiency and economic development opportunities for public housing residents.

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs (91.220 (c) and (e))

1. *Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.*

The greatest needs in the community at this time are for jobs and affordable housing. The housing program plans include the addition of supportive and accessible housing with options for seniors and persons with disabilities. The Compliance Department is working to get information to residents educating them about their rights.

The City is partnering with agencies to provide job training, literacy classes and mentoring programs.

2. *Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.*

The City has applied for additional grants that would provide job-training opportunities. We are also working to develop new relationships in the public and private sectors to expand our resources. The City is aggressively pursuing new grants and funding sources.